



KO'OLAUPOKO HAWAIIAN CIVIC CLUB

July 20, 2015

Mr. Dean Higuchi
USEPA Region 9
300 Ala Moana Boulevard, Room 5124
Honolulu, HI 96850

Ms. Roxanne Kwan
Hawaii Department of Health
919 Ala Moana Boulevard, No. 212
Honolulu, HI 96814

Re: Comments on Administrative Order of Consent – Red Hill Bulk Fuel Storage Facility

Aloha USEPA and Hawaii Department of Health:

On behalf of the Ko'olaupoko Hawaiian Civic Club, I wish to register our strong concerns regarding the inadequacies of the proposed Administrative Order of Consent (AOC) which is pending final approval by the U.S. Environmental Protection Agency, the U.S. Navy, and the Hawai'i Department of Health.

The Ko'olaupoko Hawaiian Civic Club is among the largest of Hawaiian civic clubs of 67 such clubs throughout Hawaii and the continental United States. Among our important goals and objectives is to advocate for responsible management of our natural resources, mauka to makai, in the ahupua'a of Kane'ohe from Kane'ohe to Kualoa, including Kane'ohe Bay and Mo'okapu (also known as Mokapu).

Although the Red Hill Bulk Fuel Facility is not within this geographic area, the impact of fuel contamination of the Pearl Harbor aquifer is certain to affect all of us here in Ko'olaupoko. If the United States Navy does not take full responsibility for immediately correcting the defective fuel containers by repairing or relocating these tanks to an area that is not above fresh water resources, the long-term cost will be borne by all of the people of the island of O'ahu.

These costs are not just for the clean-up of contaminated soils and water sources, nor just for new filtration units to clear contaminants from drinking water – it is likely to affect our own fresh water resources here on Windward O'ahu.

That, in our view, is the greatest threat – that water from Ko'olaupoko will be diverted to replace failing water sources in Leeward O'ahu or the Honolulu (Kona) district, once they are no longer usable due to anticipated longterm leakage of jet fuel into aquifers that supply those districts.

Public information disseminated by your agencies indicated that you have no intention of revising the draft AOC unless new information is provided. We submit that your draft AOC is critically deficient in acknowledging the obligation of all three agencies – DOH, USEPA and USN – to protect the public from contamination of our finite natural fresh water resources. By Federal and State law, you are obligated to take emergency action to:

- Stop the leaks and repair the tanks immediately

- Expedite a cleanup of contaminated soils and groundwater sources
- Cover the cost of additional water monitoring and associated tasks assumed by the City & County of Honolulu's Board of Water Supply
- Protect this island's fresh water resources from further harm.

We note that your plan has not clarified what kind of immediate ACTION steps will be taken by the U.S. Navy other than to plan for drilling of new monitor wells.

We would like to recommend that the Navy launch an emergency task force to complete its work within 90 days that will affirmatively examine the relocation of the fuel tanks to a site on or near Pearl Harbor Naval Base, where most of this fuel is and will be needed.

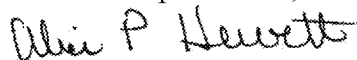
In addition, the issue of the cost of relocating the tanks has been raised. In our view, the cost of damaging the Pearl Harbor water aquifer is far greater, and this threat of contamination is a deeply serious matter.

Why aren't the USEPA and Navy looking into requesting Homeland Security funds to address this domestic threat to our communities? An entire island's water resources are potentially at risk because of the lack of proper maintenance of the facility by the federal agency – Department of Defense – for the past six decades.

Two years of study is far too long. We hold your agencies responsible for taking quicker action, and request that the AOC be amended to address the need for emergency action.

Mahalo for the opportunity to offer our mana'o. We would appreciate a response letter from the U.S. Environmental Protection Agency to inform us what actions you and your agency partners will be doing to address the questions and concerns we have raised.

Me kealoha pumehana,



ALICE P. HEWETT
President

The Ko'olaupoko Hawaiian Civic Club was established in 1937 and is a not-for-profit community organization dedicated to preserving and perpetuating the history, heritage and culture of Native Hawaiians. One of the largest of the Hawaiian Civic Clubs, its membership is open to people of Hawaiian ancestry and those who are "Hawaiian at heart".

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